

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001**

**Retail Access Optimization Initiative**

**Docket No. N2011-1**

**September 29, 2011**

**National League of Postmasters  
Motion to Reschedule Entry of Rebuttal Testimony of League Witness Donald  
Hobbs into the Record, NLPM-RT-2**

The National League of Postmasters hereby moves to reschedule the entry of Mayor Donald Hobbs' Rebuttal Testimony, NLPM-RT-2, into the record, together with any cross-examination the parties may wish, or for any questions the Commission may have, from Tuesday October 11, 2011 to the following week. Monday October 17 or Tuesday October 18 would be preferable.

Mayor Hobbs had arranged his work schedule to be available on the original date set for the hearing, October 3, and indeed, had bought his plane tickets. However, Mayor Hobbs is unavailable on October 11 due to prior work commitments with his employer, Dobson Pipe Organ builder, to lead the team which is installing a major pipe organ in a Birmingham, Alabama church that week.

Since Mayor Hobbs' Rebuttal Testimony was filed on September 26, 2011, and any discovery concerning his testimony will be concluded on October 3, 2011, this requested change in the date he presents his testimony can be accomplished without

causing any other change in the Commission's Revised Procedural Schedule, nor cause any prejudice to any party.

Mayor Hobbs' testimony describes how small rural post offices are vital to the economy and social structure of rural America, and thus key to the Universal Service obligation of the Postal Service. As such, his testimony goes to the heart of the public policy matter that is at issue here, and Mayor Hobbs is the only elected representative of rural America to come before the Commission in this proceeding. The Commission should not be deprived of the opportunity to hear him and have a dialogue with him.

The League realizes that speed is of the essence, but a delay of less than a week would prejudice no party and should not extend this proceeding.

Respectfully submitted this 29th day of September, 2011.

/s/ Robert J. Brinkmann

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